

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO.</b> _____
<b>v.</b>	<b>:</b>	<b>DATE FILED:</b> _____
<b>NEFERTITI RANDALL</b>	<b>:</b>	<b>VIOLATIONS:</b>
	<b>:</b>	<b>18 U.S.C. § 1344 (bank fraud - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 2 (aiding and abetting)</b>

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**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

At all times material to this indictment:

1. Bank of America was a financial institution, the deposits fo which were insured by the Federal Deposit Insurance Corporation, certificate no. 27595.
2. Bank of America issued credit cards to qualified applicants, who were then authorized to use the cards to make purchases and cash withdrawals. Bank of America paid out money to the merchants or banks where the credit cards were used, and then billed the credit card account holders.
3. At the request of credit card holders, Bank of America issued replacement cards, issued duplicate cards, and processed change of address requests.

4. From on or about July 28, 2002, through on or about November 19, 2002, in the Eastern District of Pennsylvania and elsewhere, defendant

**NEFERTITI RANDALL**

knowingly executed, attempted to execute, and aided and abetted the execution of a scheme to defraud Bank of America and to obtain monies owned by and under the custody and control of that bank by means of false and fraudulent pretenses, representations, and promises.

It was part of the scheme that:

5. Defendant NEFERTITI RANDALL, without authorization, had herself added as a user of a credit card account of R.R. and P.R. Defendant RANDALL then had the credit card diverted to an address within her control.

6. Defendant NEFERTITI RANDALL then obtained from Bank of America an unauthorized credit card on the victims' account through false representations.

7. Defendant NEFERTITI RANDALL used this unauthorized credit card to make approximately \$10,103 in purchases by posing as the authorized holder of the credit card account.

In violation of Title 18, United States Code, Sections 1344 and 2.

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**

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**PATRICK L. MEEHAN**  
**UNITED STATES ATTORNEY**